

**BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001**

**First-Class Mail and Periodicals
Service Standard Changes, 2021**

Docket No. N2021-1

**DOUGLAS F. CARLSON
ANSWER IN OPPOSITION TO POSTAL SERVICE MOTIONS TO BE
EXCUSED FROM RESPONDING TO INTERROGATORIES
DFC/USPS-T1-15 AND DFC/USPS-T3-3**

May 10, 2021

On May 6, 2021, the Postal Service filed a motion to be excused from responding to interrogatory DFC/USPS-T1-15. On May 7, 2021, the Postal Service filed a motion to be excused from responding to interrogatory DFC/USPS-T3-3.

Interrogatory DFC/USPS-T1-15 states, "Please provide an overview of the air transportation network for First-Class Mail, Priority Mail, and Priority Mail Express that describes the air carriers that serve each mail class and the approximate proportion of the total volume that is allocated to each carrier." This interrogatory seeks information to allow participants to understand the big picture of the Postal Service's transportation network to allow for discovery on the question of whether the Postal Service has considered alternatives to the proposal described in this docket. Although participants are not permitted to submit their own proposals, they are very much entitled to argue to the Commission that the Postal Service has not considered alternatives. The Postal Service possesses all the information about its transportation networks and has already indicated during the pre-filing conference or the technical conference that mail from various services may be mixed if the proposal is implemented. Witness Cintron testified that the Postal Service may combine First-Class Mail volume with volume on

another network, the NDC network. USPS-T-1 at 28–29. Therefore, the Postal Service has already placed into issue the potential to transport First-Class Mail on alternate transportation.

Interrogatory DFC/USPS-T3-3 states, “Please provide quarterly service performance scores for the nation, as distinct from individual districts, from 1998 to the present.” The Postal Service promises to achieve 95 percent on-time delivery by changing service standards and shifting First-Class Mail from air transportation to ground transportation. USPS-T-1 at 35. Indeed, this prospective improvement forms the basis for the Postal Service’s proposal. Participants are entitled to test this assertion. Fortunately, an excellent example exists. In 2000 and 2001, the Postal Service changed First-Class Mail service standards to limit the two-day delivery area to the range of surface transportation. The Commission’s public report in Docket No. C2001-3 provides additional background information. Participants need to analyze whether service performance increased after the Postal Service implemented a similar change in 2000 and 2001, under justifications similar to the ones advanced in this proceeding. The data that I requested will allow for this probative analysis before the Postal Service possibly repeats the same mistakes from two decades ago.

I request that the presiding officer withdraw his rulings issued today on the Postal Service’s motions because he issued those rulings, POR N2021-1/2 and N2021-1/3, before my deadline to answer the Postal Service’s motions expired.

Respectfully submitted,

Dated: May 10, 2021

DOUGLAS F. CARLSON